

ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FRANK BILELLO, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE RETIREMENT PLAN,
JPMORGAN CHASE DIRECTOR OF HUMAN
RESOURCES, as administrator of the JPMorgan
Chase Retirement Plan,

Defendants

Civ. No. 07-7379 (RJS)(FM)

**NOTICE OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Peter S. Linden, a member in good standing of the bar of this Court, on behalf of plaintiff Frank Bilello hereby move for an Order allowing the admission *pro hac vice* of the following attorneys:

Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden, of Schiffrin Barroway Topaz & Kessler, LLP, 280 King of Prussia Road, Radnor, PA 19087, Tel.: (610) 667-7706, Fax: (610) 667-7056, emails: jmeltzer@sbtclaw.com, eciolko@sbtclaw.com and jweeden@sbtclaw.com.

Joseph H. Meltzer is a member in good standing of the Bar of the State of Pennsylvania; of the Eastern District of Pennsylvania; and of the 1st, 3rd, 4th, 9th and 11th Circuits.

Edward W. Ciolko is a member in good standing of the Bar of the State of New Jersey; of the District of New Jersey; and of the 1st, 9th and 11th Circuits.

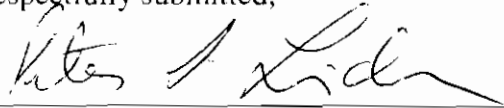
Joseph A. Weeden is a member in good standing of the Bar of the State of Virginia.

There are no pending disciplinary proceedings against Joseph H. Meltzer, Edward W. Ciolko or Joseph A. Weeden in any State or Federal Court.

WHEREFORE, on the basis of this motion and the accompanying Affidavit of Peter S. Linden, plaintiff asks that the Court admit Joseph Meltzer, Edward Ciolko, and Joseph Weeden *pro hac vice* in this action.

Dated: November 1, 2007
New York, NY

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter S. Linden", written over a horizontal line.

Peter S. Linden, (PL-8945)
Kirby McInerney LLP
830 Third Avenue
New York, NY 10022
Tel.: (212) 371-6600
Fax: (212) 751-2540

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**AFFIDAVIT OF PETER S. LINDEN IN
SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

State of New York)
) ss:
County of New York)

Peter S. Linden, being duly sworn, hereby deposes and says as follows:

1. I am counsel at Kirby McInerney LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York. I am admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden since January 2006.

4. Joseph H. Meltzer is a partner at Schiffrin Barroway Topaz & Kessler, LLP at Radnor, PA, and Edward W. Ciolko and Joseph A. Weeden are associates at that firm.

5. I have found Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden to be skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

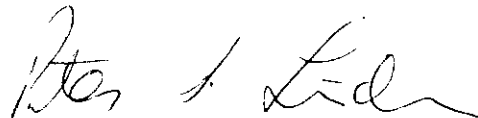
6. Attached hereto as Exhibit A are certificates of good standing for Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden, each certificate bearing the raised seal of the Supreme Court of the state in which they are admitted.

7. In addition, I have been informed by these attorneys that they are admitted to the federal courts listed in the accompanying motion and that there are no pending disciplinary proceedings against these attorneys.

8. Accordingly, I am pleased to move the admissions of Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden *pro hac vice*.

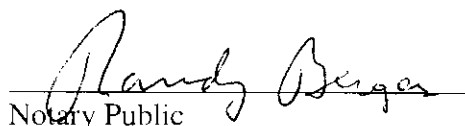
9. I respectfully submit a proposed order granting the admission of Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.



Peter S. Linden (PL-8945)

Sworn to before me
this 1st day of November, 2007


Notary Public

RANDALL K. BERGER
Notary Public, State of New York
No. 31-5056235
Qualified in New York County
Commission Expires 3/6/08



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Joseph Howard Meltzer, Esq.

DATE OF ADMISSION

November 6, 1997

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: October 16, 2007


Patricia A. Johnson
Chief Clerk

Supreme Court of New Jersey

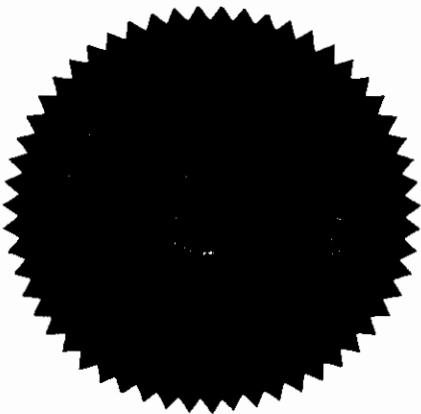


Certificate of Good Standing

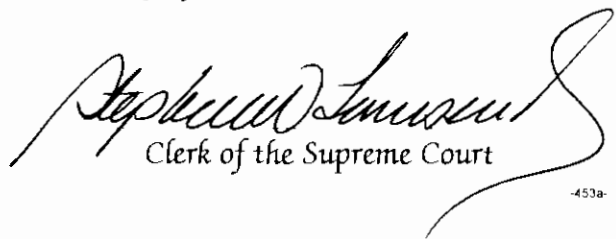
This is to certify that **EDWARD W CIOLKO**
(No. **005462002**) was constituted and appointed an Attorney at Law of New
Jersey on **September 13, 2002** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
16TH day of October , 20 07


Clerk of the Supreme Court

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,
do hereby certify that

JOSEPH ADETANO WEEDEN

was admitted to practice as an attorney and counsellor at the bar of this Court on
October 28, 2002.

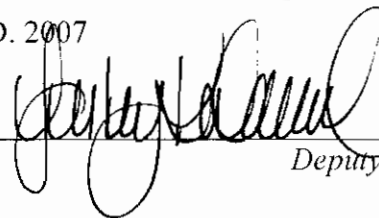
I further certify that so far as the records of this office are
concerned, JOSEPH ADETANO WEEDEN is a member of the bar of this
Court in good standing.

Witness my hand and seal of said Court

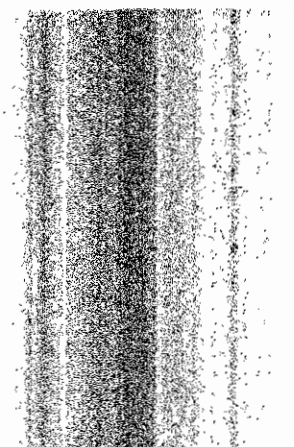
This 16th day of October

A.D. 2007

By:



Deputy Clerk



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JPMORGAN CHASE DIRECTOR OF HUMAN
RESOURCES, as administrator of the JPMorgan
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Defendants

**ORDER FOR ADMISSION *PRO HAC*
VICE ON WRITTEN MOTION**

Upon the Motion of Peter S. Linden, attorney for Frank Bilello, and proposed class counsel for the putative class, and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Joseph H. Meltzer, Edward W. Ciolko and Joseph A. Weeden, of Schiffrin Barroway Topaz & Kessler, LLP, 280 King of Prussia Road, Radnor, PA 19087, Tel.: (610) 667-7706, Fax: (610) 667-7056 are admitted to practice *pro hac vice* as counsel for Frank Bilello, and proposed class counsel for the putative class, in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: _____

United States District/Magistrate Judge

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AFFIDAVIT OF SERVICE

Ricardo Wright, being duly sworn, says:

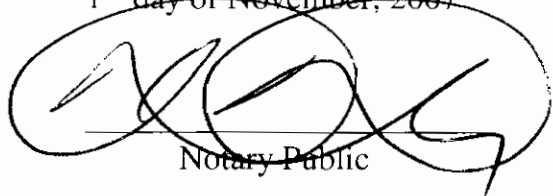
Deponent is not a party to the action, is over the age of 18 years, is a resident
of Brooklyn, New York.

On, November 1, 2007, deponent served the within NOTICE OF MOTION
PRO HAC VICE, AFFIDAVIT OF PETER LINDEN and PROPOSED ORDER, as indicated
below:

Thomas C. Rice, Esq.
Simpson Thacher Bartlett
425 Lexington Avenue
22nd Floor
New York, NY 10017


RICARDO WRIGHT

Sworn to before me this
1st day of November, 2007


Notary Public

NORMA ROPER
Notary Public, State of New York
No. 01RO6116250
Qualified in Kings County
Commission Expires September 20, 2008

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Dated: _____

United States District/Magistrate Judge